

Roberts, Bradley

From: Roberts, Bradley
Sent: Monday, October 20, 2014 3:54 PM
To: Rockel, Richard A.
Cc: Jeff Johnson
Subject: RE: New apps at the Oxy site
Attachments: 054046Memo-14.pdf; Scanned from a Xerox multifunction device.pdf

Richard, In response to your letter dated September 30, 2014 (scanned copy attached for you convenience), I'm forwarding information (attached memo from Occidental's contractor) to support EPA's previous assertion that additional appropriations in the vicinity of the Occidental Chemical site would be problematic. Please consider this information in regards to your processing of the corresponding appropriation requests. Thank you.

Brad Roberts, Environmental Scientist
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Email: roberts.bradley@epa.gov

From: Roberts, Bradley
Sent: Tuesday, July 29, 2014 3:46 PM
To: 'Rockel, Richard A.'; Garrett, David
Cc: Juan Somoano; Clegg, Bruce
Subject: RE: New apps at the Oxy site

Richard, I was just speaking with my contacts for the Occidental project (Juan Somoano and Bruce Clegg) about the progress of their facility investigation and interim measures for controlling exposure to contamination, and I mentioned the issue of demonstrating the potential negative impact of additional pumping downgradient of the existing groundwater contaminant plume as you refer to below. Like EPA, they're concerned about the possibility that additional irrigation pumping would tend to expand the size of the plume - making their requirement for controlling migration of the plume considerably more difficult. They offered to assess what information they have available and assemble something for your review. I look forward to talking with you, in case you have any questions I can help with in the interim. Thank you.

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RCRA



550518

From: Rockel, Richard A. [mailto:Richard.Rockel@KDA.KS.GOV]
Sent: Thursday, July 17, 2014 9:57 AM
To: Garrett, David

Cc: Roberts, Bradley; Juan Somoano
Subject: RE: New apps at the Oxy site

As far as I'm aware, nothing has happened since 2012. We need to get data that shows how these applications will negatively impact the public interest, or by statute we don't have many options but to approve them if they meet all the applicable regulations.

Attached is the information that was forwarded to me from Doug, just going off this information, I don't have anything that shows how the pending applications will impact the plume or what radius will impact the plume. Let me know if I didn't get all the information that you sent.

Thanks,

Richard Rockel, Environmental Scientist
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www.agriculture.ks.gov

From: Garrett, David [<mailto:Garrett.David@epa.gov>]
Sent: Wednesday, July 16, 2014 1:53 PM
To: Rockel, Richard A.
Cc: Roberts, Bradley; Juan Somoano; Garrett, David
Subject: RE: New apps at the Oxy site

Hello Richard.

It would be helpful if you contact Brad Roberts who I have cc'd on this email. I handed the baton to Brad in 2012. I currently am involved with Oxy's deep wells while Brad has the remediation of the shallow groundwater. That said, we are interested in making sure that Occidental Chemicals plume does not migrate beyond its current location. Brad can elaborate more, but basically our position is the same as it was in 2012 when I emailed Doug all of the information that you're requesting.

I am curious what has transpired on this subject since 2012?

P.S.- I believe Brad is on vacation right now and we'll return to the office on or around 7/23.

Thanks.

David Garrett
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EPA Region 7: Water, Wetlands and Pesticides Division
Drinking Water Management Branch
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From: Rockel, Richard A. [<mailto:Richard.Rockel@KDA.KS.GOV>]
Sent: Wednesday, July 16, 2014 9:30 AM
To: Garrett, David
Subject: RE: New apps at the Oxy site

David,

I am attempting to piece some information together on this site and the surrounding pending applications. Do you have any information that you can share that will show the remediation plan over time? Am needing information to show how the approval of these nearby applications will negatively impact the public interest through plume expansion, movement, or other factors that we are not aware of. K.S.A. 82a-711 requires us to approve all applications unless they will unreasonably impact the public interest, I am needing some data to show that these applications will cause a negative impact on the plume. Also, will need to establish an area where additional pumping will impact the plume. i.e. will an application 3+ miles cause a long term impact on the remediation site?

Some items that might be useful: maps showing the plume concentration/movement over time, projected plume movement maps, any sort of drawdown tests with the variables used (transmissivity/storage coefficient), any groundwater model data that you believe shows the current or future conditions.

Again am just in the process of putting together information so a decision can be made on these pending applications.

Thank you for your time,

Richard Rockel, Environmental Scientist
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From: Schemm, Doug
Sent: Tuesday, July 08, 2014 9:59 AM
To: Rockel, Richard A.
Subject: FW: New apps at the Oxy site

Here ya go. The map shows all the apps in the area.

From: David Garrett [<mailto:Garrett.David@epamail.epa.gov>]
Sent: Tuesday, October 09, 2012 2:43 PM
To: Schemm, Doug
Cc: Lanterman, Jeff; Kopp, Kenneth; Letourneau, Lane; Bradley Roberts; David Garrett
Subject: Re: New apps at the Oxy site

Doug,

Hello. Attached is an addition to the figure that you sent me earlier, a trends chart & map along with pages from their RCRA permit. The changes include Occidental Chemicals aka Vulcan monitoring wells along with extraction/interceptor wells that were not originally annotated on this figure and most likely are not on the Kansas Well Database, the addition of these wells should provide some context to the eastern area of Oxy's pumping. We have the following concerns:

Please note that in that direction, Oxy has greater spacing of their wells along 63rd St., so they have less ability to influence pumping to the south. Oxy is not interested, nor is EPA Region 7 in only allowing the groundwater contamination plume to stabilize, but are focused on trying to pull the plume back westward toward their facility. Currently it is very challenging to contain Oxy's plume in both the medial (S2/S3) and deep aquifer (S1) while both Mr. Bergkamp, Mr Hay and others are pumping the groundwater for irrigation purposes to the east and southeast of the chemical plant.

The permitting of these applications has the potential of doing two negative things: 1) causing Oxy to be out of compliance of their RCRA permit due to expanded migration of plume contamination beyond current locations and 2) the potential for

new contamination being pulled eastward/southeast into locations that are currently non-detect for Oxy contamination thus degrading the quality of the groundwater in these application areas.

We suspect the increasing chemistry concentrations at MW021 over the past two years may be a result of the increased agricultural pumping already occurring to the southeast in response to drought conditions. More pumping SE and South would only exasperate the issue.

Attached below are two pages from the Occidental Chemicals RCRA Permit regarding no expansion of GW contamination along with an additional figure depicting the S2/S3 groundwater plume (CT) earlier this year and chloride concentration trends in that direction.

I would like to thank you for the opportunity to express our concerns. If we can provide you with additional information please don't hesitate to contact Brad Roberts or myself.

(See attached file: Pending Apps with IW and select MWs.pdf - Adobe Acrobat.pdf)

(See attached file: Occidental Chemicals-RCRA Permit Condition for GW Stabilization and Interim Measures.pdf)

(See attached file: CIG MW021 Slide.pdf) MW 021 Chloride Concentrations in that direction and extent of Carbon Tetrachloride in S2/S3 aquifer.

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Region 7 EPA will be relocating its office from the current Kansas City, KS location to Lenexa, KS. The Region 7 office will be in full operation at the Lenexa, KS building on October 15. The Regional Office is expecting a seamless transition. All phone numbers will remain the same. Please mail correspondence to the following address after October 15:

Environmental Protection Agency
Region 7
Water, Wetlands and Pesticide Division
11201 Renner Boulevard
Lenexa KS 66219

▼ "Schemm, Doug" ---10/01/2012 09:10:08 AM---David, Here's a general site map of the pending applications in this general area. As you requested

From: "Schemm, Doug" <Doug.Schemm@KDA.KS.GOV>
To: David Garrett/R7/USEPA/US@EPA
Cc: "Letourneau, Lane" <Lane.Letourneau@KDA.KS.GOV>, "Lantermann, Jeff" <Jeff.Lantermann@KDA.KS.GOV>, "Kopp, Kenneth" <Kenneth.Kopp@KDA.KS.GOV>
Date: 10/01/2012 09:10 AM
Subject: New apps near the Oxy site

David,

Here's a general site map of the pending applications in this general area. As you requested, I'm sending you a link to the open records request where you can obtain information on the 5 pending Irrigation applications, File Nos. 46,593; 47,235; 47513; 47535; and 47,554, it is:

http://www.ksda.gov/open_records/id/1

Once you have time to take a look at the information, we can schedule a conference call to discuss concerns and issues.

Thanks,

Doug Schemm[attachment "20120925134149503.pdf" deleted by David Garrett/R7/USEPA/US]